

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 24-CR-20255-WPD/HUNT

UNITED STATES OF AMERICA

v.

**PATRICK BOYD and
CHARLES BOYD,**

Defendants.

_____ /

**UNITED STATES' MOTION TO TRANSPORT INMATE PETER KHAIMOV
ON MONDAY, OCTOBER 6, 2025, TO TESTIFY AT TRIAL**

Comes now, the United States of America, through its undersigned counsel, and files this Motion to Transport Inmate Peter Khaimov on Monday, October 6, 2025, to Testify at Trial. Khaimov is currently housed at the Federal Detention Center in Miami, Florida, until the government plans to call him to testify in this case. The United States Marshals Service ("USMS") in Ft. Lauderdale only transports inmates from FDC Miami to Fort Lauderdale on Thursdays. As it stands, the government hopes to call Khaimov to testify at trial the week of October 6th. In order for Khaimov to arrive at the Broward County Jail in time to testify the week of October 6th, the USMS would have to transport him this Thursday, October 2nd. Khaimov is an observant, Orthodox Jewish individual, and October 2nd is Yom Kippur.

Based on Khaimov's observant religious practices, the United States respectfully moves the Court for an order directing the USMS to transport Khaimov from Miami FDC to Fort Lauderdale on October 6th, 2025, so that he may testify at this trial during the week of October 6th.

Dated: September 29, 2025

Respectfully submitted,

JASON A. REDING QUIÑONES
UNITED STATES ATTORNEY

LORINDA LARYEA, ACTING CHIEF
U.S. DEPARTMENT OF JUSTICE
CRIMINAL DIVISION, FRAUD SECTION

By: /s/ Alexander Thor Pogozelski
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LOCAL RULE 88.9(a) CERTIFICATION

On September 24, 2025, undersigned counsel conferred by email with counsel for the Defendants to obtain their position. Counsel for Charles Boyd, Bruce Zimet, represented that he has no position on the government's motion. Counsel for Patrick Boyd, William Barzee, represented that he has no objection to the government's motion.

CERTIFICATE OF SERVICE

I, Alexander Thor Pogozelski, hereby certify that on September 29, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

/s/ Alexander Thor Pogozelski
Alexander Thor Pogozelski